REMARKS

Applicants appreciate the thorough examination of the current application as evidenced by the Office Action of December 29, 2006. In particular, Applicants appreciate the Examiner's detailed Response to Arguments on pages 2-7 of the Action.

Applicants also appreciate the courtesy accorded by Examiner Kamal B Divecha to the undersigned during a telephone interview on March 28, 2006 and acknowledge the Interview Summary mailed April 10, 2006. The present remarks also shall constitute an Interview Summary pursuant to MPEP §713.04. Applicants have amended the subject matter of Claim 101 by rewriting certain recitations of Claim 101 as Claim 102, which now recites the subject matter of Claims 45-73 as suggested by the Examiner during the telephone interview on March 28, 2006. Allowance of Claim 102 is respectfully requested.

In addition, in the following remarks, the Applicants will address the Examiner's Response to Arguments and show that independent Claims 45, 74, 80, 82, 86, 87, 96, and 99 are patentable over U.S. Patent No. 6,173,322 to Hu ("Hu") and U.S. Patent No. 6,421,711 to Blumenau et al ("Blumenau").

Reconsideration of the outstanding rejections and allowance of all claims is thus respectfully requested.

Claims 45, 74, 80, 82, 86, 87, 96, and 99 are patentable over Hu and Blumenau

Independent Claim 45 recites, with emphasis added, a method of serving objects in a computing network, the method including:

> receiving a request for an object stored on an intelligent storage system, the request being received by a web server, and the intelligent storage system comprising a plurality of storage devices and a control unit configured to determine a mapping for the request to one of the plurality of storage devices;
>
> evaluating the request based on criteria;
>
> if the criteria are met, redirecting the request to **the control unit** of the intelligent storage system; and
>
> if the criteria are not met, serving the stored object via the web server.

Independent Claims 74, 80, 82, 86, 87, 96, and 99 similarly recite redirecting the request to the **control unit** of the intelligent storage system. Hu and Blumenau do not teach or suggest redirecting a request to **the control unit** of an intelligent storage system if the criteria are met as recited in the current claims. The intelligent storage system includes a plurality of storage devices and a control unit configured to determine a mapping for the request to one of the plurality of storage devices.

The Action states that Hu does not teach away from a redirect link that is configured to redirect the request to the control unit even though Hu discusses that a direct connection between the content server and the client would result in significantly more efficient communication. *See* the Action, page 2. The Action states that "Hu does teach that a direct connection between the content server and the client would result in more efficient communication **based on the redirection criteria such as a location of the client, proxy and the content server.**" *See* the Action, page 3. The Action further states on pages 3-4 as follows (emphasis added):

> even if Hu teaches away from a redirect link that is configured to redirect the request to the control unit of the intelligent storage system, Hu's system explicitly reads onto the claimed subject matter of the instant application. On the other hand, the claim language does not state that direct connection between the content server and the client should not result in significantly more efficient communication. Therefore teaching away does not necessarily mean that the system is not capable of performing the claimed invention of the present invention.
>
> Applicant admitted that the redirect mode proposed by Hu returns to the requesting client whatever information is required to enable the client to establish a **direct connection** with the content server (remarks, pg.14) but argues that the redirect mode of Hu is not equivalent to the redirect link as recited in current claims.

Applicants maintain that the redirect mode of Hu is not equivalent to the redirect link as recited in the current claims, and that the system proposed by Hu does not perform the claimed invention of the present application as stated in the Action. The current claims recite redirecting a request to **the control unit** of an intelligent storage system having a plurality of storage devices if certain criteria are met. The control unit is configured to determine a

mapping for the request to one of the plurality of storage devices as recited in the current claims. In contrast, Hu discusses a redirect mode that returns "whatever information" is required to enable the client to establish a **direct connection** to a content server based on redirection criteria. (Hu, col. 3, lines 8-10.) The content servers **106** in Hu provide the content sought by the content request directly. (Hu, col. 4, lines 33-34.) Accordingly, the system proposed by Hu **does not** read onto the claimed subject matter of the current application as alleged in the Action.

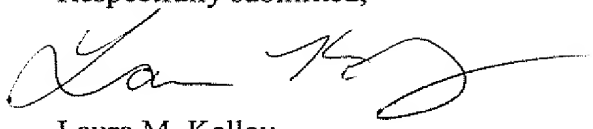
Moreover, there is no motivation to combine Hu and Blumenau. Blumenau merely proposes a storage controller that is programmed to provide a plurality of virtual ports for routing storage access requests from a physical data port to a virtual port. (Blumenau, col. 2, lines 48-55.) The Action states that one of ordinary skill would have been motivated to combine Hu and Blumenau to reduce the cost of management by reducing the number of storage objects to be managed, to give the storage controller controlled access to the data storage, and to provide an efficient storage system with increased storage capacity. *See* the Action, page 9. Applicants submit that there is no motivation to combine Hu and Blumenau without impermissible hindsight because Hu teaches away from such a combination. In particular, modifying Hu to redirect a request to **a storage controller** would **destroy the purpose** of Hu (*i.e.*, to establish a **direct connection to a content server** based on redirection criteria).

For at least these reasons, independent Claims 45, 74, 80, 82, 86, 87, 96, and 99 are patentable over Hu and Blumenau. Claims 44-73 depend from Claim 45, Claims 75-59 depend from Claim 74, Claims 82-85 depend from Claim 80, Claims 88-95 depend from Claim 87, and Claims 98-99 depend from Claims 96. Such claims are patentable at least per the patentability of the claims from which they depend.

CONCLUSION

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested.

Respectfully submitted,



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